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Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MICHAEL PAGE,

Plaintiffs,

vs.

BALJIT MANJU and DHESI LOGISTICS  
LLC,

Defendants.

**CASE NO:** 2:23-cv-01136-JCM-EJY

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
PLAINTIFF'S OPPOSITION TO  
MOTION TO DISMISS**

IT IS HEREBY STIPULATED AND AGREED, by and between RYAN L. DENNETT, ESQ. of DENNETT WINSPEAR, counsel for Defendants, and WILLIAM W. McGAHA, ESQ. of SCHUETZE, McGAHA, TURNER & FERRIS, PLLC, counsel for Plaintiff, that:

The due date for Plaintiff's Opposition to Defendants' Motion to Dismiss (ECF No. 5) be extended from September 7, 2023, to September 21, 2023.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

The parties to this action are not making this request for the purpose of unduly delaying the trial in this matter. The issues in this case are complicated and therefore the Opposition is taking up more time than other cases would. Therefore, the Plaintiff requires additional time to draft his Opposition to Motion to Dismiss. They therefore stipulate to

1 extend the time for Plaintiff to file his Opposition to Motion to Dismiss to until September  
2 21, 2023.

3 WHEREFORE, the parties respectfully request that this Court extend the time to  
4 file Plaintiff's Opposition to Motion to Dismiss to September 21, 2023.  
5

6 **DATED** this 31<sup>st</sup> day of August 2023

**DATED** this 31<sup>st</sup> day of August 2023

7 **SCHUETZE, McGAHA, TURNER**  
8 **& FERRIS**

**DENNETT WINSPEAR, LLP**

9 By: /s/William W. McGaha  
10 WILLIAM W. McGAHA, ESQ.  
11 Nevada Bar No. 003234  
601 S. Rancho Drive, Suite C-20  
12 Las Vegas, Nevada 89106  
Telephone: (702) 369-3225  
13 Attorneys for Plaintiff  
*Michael Page*

By: /s/Ryan L. Dennett  
14 RYAN L. DENNETT, ESQ.  
Nevada Bar No. 005617  
15 BRENT D. QUIST, ESQ.  
Nevada Bar No. 009157  
3301 N. Buffalo Drive, Suite 195  
16 Las Vegas, Nevada 89129  
Attorneys for Defendants  
*Baljit Manju and Dhesi Logistics LLC*

17 **ORDER**

18 IT IS SO ORDERED.

19 **DATED** September 5, 2023.

20   
21 **U.S. DISTRICT COURT JUDGE**

## Donna Brand

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**From:** Ryan Dennett <rdennett@dennettwinspear.com>  
**Sent:** Thursday, August 31, 2023 11:25 AM  
**To:** Donna Brand  
**Cc:** Bill McGaha; Heather Moore; Theresa Amendola  
**Subject:** Re: Michael Page v. Dhesi Logistics, Mtn to Dismiss  
**Attachments:** SAO-Ext Deadline for OPPS Mot Dismiss.pdf

That is fine. You may affix my signature.

Ryan Dennett

On Aug 31, 2023, at 1:28 PM, Donna Brand <dbrand@smlvlaw.net> wrote:

Attached is a draft of the Stip to Ext Deadline for Opposition for your review.

Donna Brand  
Senior Litigation Paralegal  
SCHUETZE, McGAHA, TURNER & FERRIS PLLC  
601 S. Rancho Drive, Suite C-20  
Las Vegas, Nevada 89106  
(725) 228-3253 Direct Dial  
(702) 369-3225 Main  
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**From:** Ryan Dennett <rdennett@dennettwinspear.com>  
**Sent:** Saturday, August 26, 2023 3:28 PM  
**To:** Bill McGaha <bmcgaha@smlvlaw.net>  
**Cc:** Donna Brand <dbrand@smlvlaw.net>; Heather Moore <hmoore@smlvlaw.net>  
**Subject:** Re: Michael Page v. Dhesi Logistics, Mtn to Dismiss

Of course.

Ryan Dennett

On Aug 26, 2023, at 2:25 PM, Bill McGaha <[bmcgaha@smlvlaw.net](mailto:bmcgaha@smlvlaw.net)> wrote:

Ryan:

On the motion to dismiss, are you agreeable to a SAO to extend the response date back 2 weeks to Sept. 21st? I am going to be in Utah for most of that time and need the additional time for my brief.

Kindest Regards,

Bill

William W. McGaha, Esq.

**Legalride, L.L.C.**

**Schuetze, McGaha, Turner & Ferris, P.L.L.C.**

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